

Sydney Metro – Western Sydney Airport

EPBC Act (2020/8687) Annual Compliance Report
21 July 2025 – 20 July 2026

Document Control

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Position	Name	Signature	Date
Director Project Environment, Sustainability & Planning			2 October 2026

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Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents.

The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed



Full name



Position

Director Project Partnering - Environment, Sustainability and Planning, Sydney Metro – Western Sydney Airport (SM-WSA)

Organisation

Sydney Metro

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12 354 063 515

Date

2/10/2026

1. Introduction

1.1 Purpose

This compliance report covers the reporting period between 21 July 2025 and 20 July 2026 in respect of the *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act) Approval (2020/8687). The purpose of this report is to document compliance with the conditions for the EPBC (2020/8687) approval. Details of compliance are provided, and where appropriate, the timing of individual actions as identified.

According to the EPBC (2020/8687) conditions of approval “Commencement of the action” is defined as the first instance of any specified activity associated with the action including clearing and construction. Commencement of the action does not include minor physical disturbances or investigation works.

The key dates that relate to the approval are detailed in Table 1.

Table 1: Key approval dates

Action	Key Date
Commonwealth approval	3 June 2021
Commencement of the action	20 July 2022
Expiry of Commonwealth approval	31 December 2100

1.2 Project overview

The Sydney Metro – Western Sydney Airport (SM-WSA) Project involves the construction and operation of a new metro railway line around 23 kilometres in length that extends from the existing Sydney Trains suburban T1 Western Line (at St Marys) in the north to Bradfield in the south. The alignment includes a combination of tunnel, surface, bridges, and viaduct sections, and comprises six new metro stations between St Marys and Bradfield City (formerly known as the Aerotropolis Core precinct), as well as a stabling and maintenance facility and operational control centre to support the operation of the new metro railway line. The approved action only relates to part of the project and is summarised in section 1.3 below.

There are three principal statutory schemes that govern the planning and assessment process for the project:

- *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) applies to works located outside the boundary of Western Sydney International (Nancy-Bird Walton) Airport (referred to as Western Sydney International) (off-airport)
- *Commonwealth Airports Act 1996* (Airports Act) applies to works located within the boundary of Western Sydney International (on-airport)
- *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act):
 - For works located north of Western Sydney International (off-airport), assessment and approval was required under Part 8 and 9 of the EPBC Act to address impacts on listed threatened species and communities and Commonwealth land
 - For the lands located south of Western Sydney International (off-airport), impacts on matters of national environmental significance (MNES) and Commonwealth land have already been assessed and approved under a strategic assessment in accordance with Part 10 of the EPBC Act.

Figure 1 shows the statutory approval regime applicable to different areas of the project areas.

The EPBC (2020/8687) approval relates to works located on State land to the north of Western Sydney International (Nancy-Bird Walton) Airport (Western Sydney International) to address impacts on listed threatened species and ecological communities, and Commonwealth land. Other parts of the SM-WSA Project have been approved under other mechanisms and are not included in the scope of this compliance report.

The Sydney Metro – Western Sydney Airport (SM-WSA) EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687) was prepared in October 2020 to assess the impacts of construction and operation of a rail link from St Marys to Elizabeth Drive, Badgerys Creek, as a controlled action under the EPBC Act, (the approved action). This document was exhibited between 21 October 2020 and 18 November 2020 in accordance with section 95A of the EPBC Act.

The SM-WSA EPBC 2020/8687 referral was approved, subject to conditions, by the Commonwealth Minister for the Environment on 3 June 2021 under Part 9 of the EPBC Act.



Figure 1: Planning approval context from the Sydney Metro – Western Sydney Airport Project

1.3 Description of the approved action

The Sydney Metro – Western Sydney Airport (SM-WSA) EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687) provides a detailed description of the approved action and should be referred to where further information is required.

Key operational components of the approved action include:

- Around 4.3 kilometres of twin rail tunnels (generally located side by side) between St Marys (the northern extent of the approved action) and Orchard Hills
- A cut-and-cover tunnel around 350 metres long (including tunnel portal), transitioning to an in-cutting rail alignment south of the M4 Western Motorway at Orchard Hills
- Around 10 kilometres of rail alignment between Orchard Hills and Western Sydney International (the southern extent of the approved action), consisting of a combination of viaduct and surface rail alignment
- Three new metro stations:
 - St Marys (providing interchange with the T1 Western Line)
 - Orchard Hills
 - Luddenham
- Grade separation of the track alignment at key locations including:
 - Where the alignment interfaces with existing infrastructure such as the Great Western Highway, M4 Western Motorway, Lansdowne Road, Patons Lane, the Warragamba to Prospect Water Supply Pipelines (the pipelines), Luddenham Road, the future M12 Motorway and Elizabeth Drive
 - Crossings of Blaxland Creek and Cosgroves Creek and other small waterways to provide flood immunity for the project
- Modifications to the existing Sydney Trains station and rail infrastructure at St Marys to support interchange and customer transfer between the new metro station and the T1 Western Line
- A stabling and maintenance facility and operational control centre located to the south of Blaxland Creek and east of the proposed metro track
- An integrated tunnel ventilation system including a potential service facility at Claremont Meadows, as required
- All operational systems and infrastructure such as crossovers, rail sidings, signalling, communications, overhead wiring, power supply, lighting, fencing, security and access tracks/paths
- Retaining walls at required locations along the alignment
- Environmental protection measures such as noise barriers (if required), on-site water detention, water quality treatment basins and other drainage works.

Construction activities that would be undertaken for the approved action include:

- Enabling works
- Main construction works including:
 - Tunnelling and associated works
 - Corridor and associated works
 - Stations and associated works
 - Ancillary facilities and associated works
- Rail systems fit out
- Finishing works, as well as testing and commissioning

1.4 Location of the approved action

Land to which the EPBC (2020/8687) approval applies is shown in Figure 2, Figure 3 and Figure 4. The construction boundaries and final surface levels shown are indicative only and are subject to construction planning and detailed design.

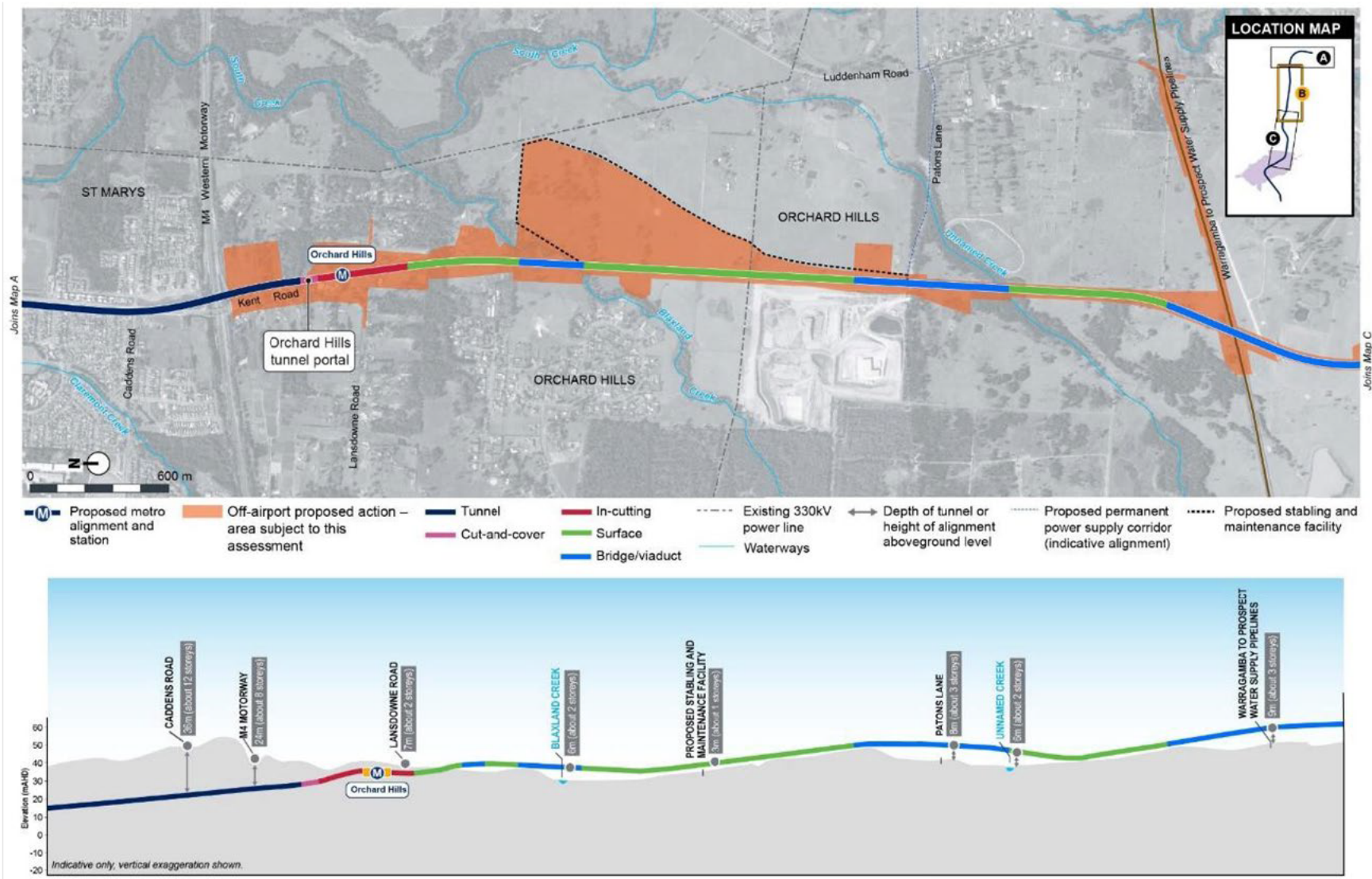


Figure 3: Location of the Project – Orchard Hills to Warragamba to Prospect Water Supply Pipeline. Land to which this approval applies is shown in orange.

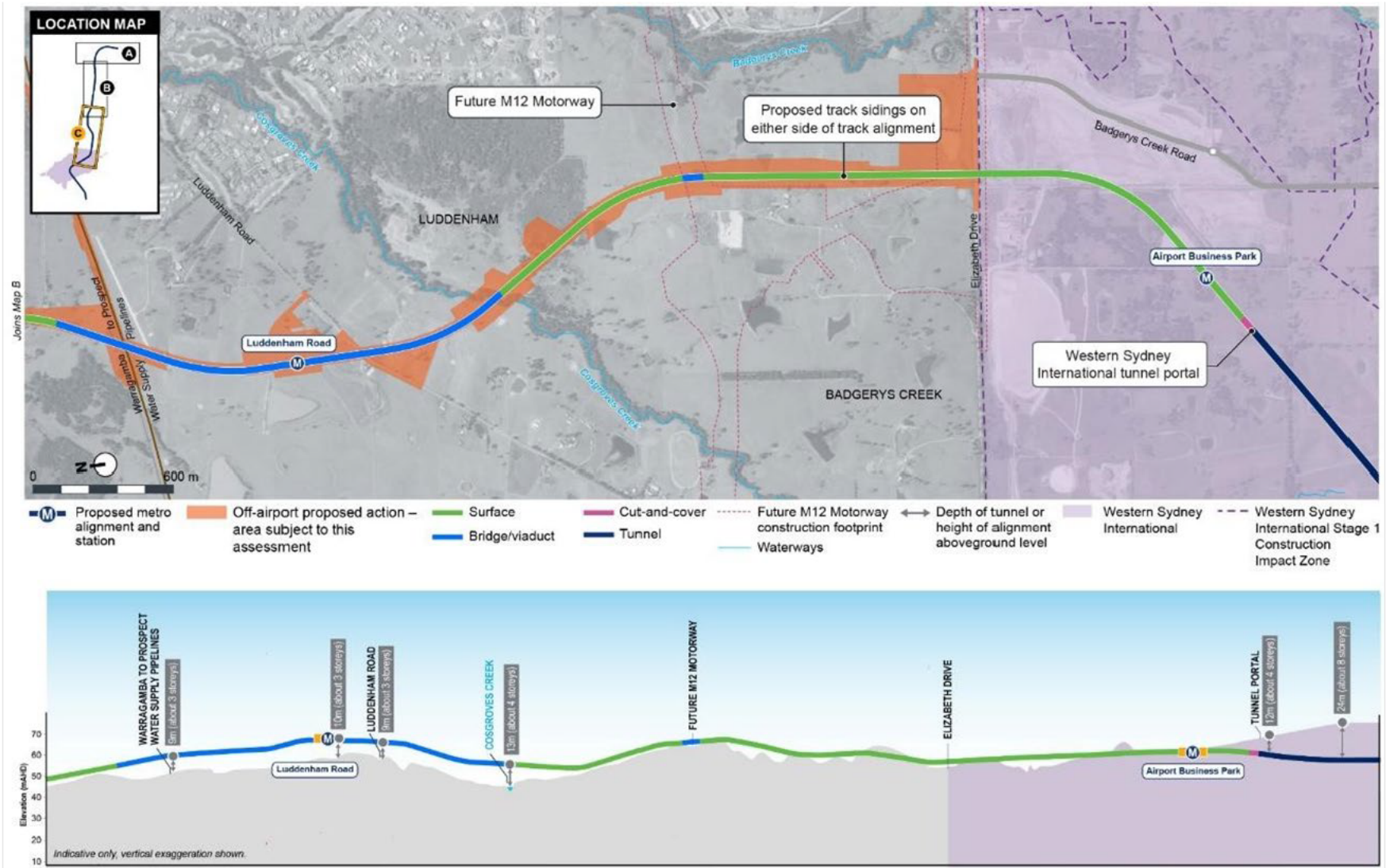


Figure 4: Location of the Project – Luddenham to Western Sydney International. Land to which this approval applies is shown in orange.

1.5 Activities undertaken during the reporting period

Construction works undertaken in the approval area during the 2025-2026 reporting period are summarised in Table 2. During the reporting period Sydney Metro has continued work on two contract packages:

1. Stations, Systems, Trains, Operations and Maintenance (SSTOM): The SSTOM package includes station fit out, precinct and transport integration works as well as finishing works, testing and commissioning. The SSTOM package is also responsible for the operation and maintenance of the Western Sydney Airport metro service. The majority of clearing would have been completed during earlier construction stages, but the SSTOM package may include some minor clearing works.
2. Finishing Auxiliary Works (FAW): The Finalisation Auxiliary Works (FAW) package was included in the SM-WSA packaging strategy to complete non-rail precinct and corridor works. It includes works that are not operated or maintained by SSTOM, and works to be handed over to local authorities. Due to the broad range of activities that will be undertaken within the FAW stage, and the different contractors involved in delivering them, for the purposes of this report, FAW scope delivered in the 2025 – 2026 reporting period includes, the continued construction of a pedestrian footbridge at St Marys Station (Footbridge St Marys or FSM).

Table 2: Construction works undertaken by each package during the 2025-2026 reporting period.

Package	Activity	Description
St Marys		
FAW	Structures (footbridge)	- Construction of concrete footings & substructure has been completed both on the platforms and on the new Sydney Trains building - All bridge planks installed over the tracks - Reinstatement of Overhead Wire (OHW) to the underside of the new bridge planks - Installation of precast stairs - Installation of all associated utilities - Hard landscaping works associated with the Northern Plaza - Fit out of bridge concourse area including installation of lifts and escalators - Construction of Sydney Trains buildings including internal fit out - All related systems, communications and electrical delivery - Installation of firefighting infrastructure
SSTOM	Site facility management and demobilisation	- Ongoing use of site facilities - Tower crane demobilisation
	Earthworks	Nil
	Structures	- Station box FRP, water proofing and fitout - Pre-cast beam installation - Façade panelling installation

Package	Activity	Description
Claremont Meadows		
SSTOM	Site facility management	Water treatment plant operations
	Earthworks	Nil
	Structures	Shaft lid installation
Orchard Hills		
SSTOM	Site facility management	- Ongoing use of site facilities. - Batch plant and water treatment plant operations.
	Earthworks	Excavation and construction of retaining wall
	Structures	- Ventilation installation and commissioning - Station box FRP, water proofing and fitout - Precast beam installation - Façade panelling installation
Lansdowne Road to Patons Lane main alignment		
SSTOM	Site facility management	Ongoing use of site facilities
	Earthworks	- Bulk earthworks - Road construction work - Active Transport Corridor earthworks - Power supply installation - Inground drainage, service and utility installation - Fencing footing works
	Structures	- Fencing installation - Form, reinforcing and concrete pour works - Galvanised steel trough (GST) installation - Rail activities - Overhead wiring installation - Cable pulling - Active Transport Corridor bridge piers and abutment construction - Lighting and comms installation.
Patons Lane to Luddenham Station (inc. Stabling Maintenance Facility)		
SSTOM (inc. SMF)	Site facility management	Ongoing use of site facilities
	Earthworks	- Bulk earthworks - Road construction works - Basin construction - Active Transport Corridor earthworks - Power supply installation - In-ground drainage, service and utility installation - Fencing footing works
	Structures	- Fencing installation - Form, reinforcing and concrete pour works - Galvanised steel trough (GST) installation - SMF building construction and fitout works - Rail activities - Overhead wiring installation - Lighting and comms installation.

Package	Activity	Description
		- Cable pulling - Train delivery and commissioning
Luddenham Station		
SSTOM	Site establishment	Site establishment and ancillary facility operation
	Earthworks	- Bulk earthworks - In ground and above ground utility installation
	Structures	- Ventilation installation and commissioning - Station structure FPR - Station box waterproofing and FRP - Precinct works - Precast beam installation
Alignment between Luddenham Station and Elizabeth Drive		
SSTOM	Site facilities management and demobilisation	- Establishment of main haul roads - Establishment of site amenities - Demobilisation of Portion 3 compound
	Earthworks	- In-ground utility installation - Fencing footing works
	Structures	- FRP works - Galvanised steel trough (GST) installation - Rail activities - Overhead wiring installation - Cable pulling - Active Transport Corridor bridge piers and abutment construction - Lighting and comms installation.
Bringelly		
SSTOM	Site establishment	Site establishment and ancillary facility operation
	Earthworks	In ground utility installation
	Structures	- Ventilation installation and commissioning - Tunnel support works
Bradfield		
SSTOM	Site facility management	- Site establishment and ancillary facility operation - Maintenance and establishment of haul roads
	Earthworks	- Bulk earthworks - In ground and above ground utility installation - Temporary and permanent car park works
	Structures	- Station structures FPR - Station box waterproofing and FRP - Precinct works - Precast beam installation

2. Compliance with Conditions of Approval

The EPBC (2020/8687) Approval contains 40 conditions of approval. Table 3 replicates the conditions, comments on compliance with the condition requirements during the reporting period and provides supporting documents to confirm findings. A summary of compliance is provided in section 3.

Table 3: EPBC (2020/8687) Conditions of Approval compliance table

No.	Condition	Status	Comments	Supporting evidence
1	The approval holder must not clear protected matters outside the study area.	Compliant	Clearing undertaken by SBT, SCAW and SSTOM during the previous 2023-24 and 2024-25 reporting periods show that Sydney Metro has not cleared any protected matters outside the study area. No additional clearing of protected matters outside the study area has been undertaken by the SSTOM contractor during the 2025-26 reporting period.	Clearing boundaries by contract: SSTOM clearing extent GIS files dated July 2026.
2	To minimise the impacts of the action on protected matters, the approval holder must not clear more than the following specified amounts within the study area:	Overall condition 2 is compliant. The sections of this condition have been separated out below.		The following is for the total cleared amounts since the project commenced.
	a. 5.87 hectares of Cumberland Plain Woodlands and Shale-Gravel Transition Forest threatened ecological community (TEC).	Compliant	Sydney Metro has not cleared more than the amounts specified in Condition 2(a) within the study area. There was no additional SSTOM clearing of Cumberland Plain Woodlands and Shale-Gravel Transition Forest TEC during the 2025-26 reporting period. As of October 2026 the contractors have cleared 4.53 hectares of the allowed 5.87 hectares of EPBC listed Cumberland Plain Woodlands and Shale-Gravel Transition Forest TEC.	Memo CoA 2 (2025-2026)
	b. 4.94 hectares of Coastal Swamp Oak (Casuarina glauca) Forest of New South Wales and South East Queensland TEC.	Compliant	Sydney Metro has not cleared more than the amounts specified in Condition 2(b) within the study area. The SSTOM contractor confirmed that 0.41 hectares of Coastal Swamp Oak (Casuarina glauca) Forest of NSW and South-East Queensland TEC has been cleared during the 2025-2026 reporting period.	Memo CoA 2 (2025-2026)

No.	Condition	Status	Comments	Supporting evidence
			As of October 2026, the contractors have cleared 2.81 hectares of the allowed 4.94 hectares of EPBC listed Coastal Swamp Oak (<i>Casuarina glauca</i>) Forest of New South Wales and South-East Queensland TEC	
	c. 24.79 hectares of Grey-headed Flying-fox foraging habitat.	Compliant	Sydney Metro has not cleared more than the amounts specified in Condition 2(c) within the study area. The SSTOM contractor have confirmed that 0.12 hectares of PCT 724 Intact, 0.03 hectares of PCT849 Thinned, 0.134 hectares of PCT 1800 Intact and 0.008 hectares of PCT1800 Thinned have been cleared during the 2025-2026 reporting period. As of October 2026, the contractors have cleared 15.484 hectares of the allowed 24.79 hectares of Grey-headed Flying-fox foraging habitat.	Memo CoA 2 (2025-2026)
	d. 7.3 hectares of native vegetation on the Defence Establishment Orchard Hills site (which may include threatened ecological communities in conditions 2a and 2b).	Compliant	Sydney Metro has not cleared more than the amount specified in Condition 2(d) within the study area on the Defence Establishment Orchard Hills (DEOH). The SSTOM contractor confirmed that 0.423 hectares of native vegetation on the Defence Establishment Orchard Hills was cleared during the 2025-2026 reporting period. As of October 2026, the total native vegetation cleared within DEOH is 4.39 hectares which is less than the 7.3 hectares permitted.	Memo CoA 2 (2025-2026)
	e. 335 identified individuals of <i>Grevillea juniperina subsp. juniperina</i> on the Defence Establishment Orchard Hills site (Lot 1 DP 629326 and Lot 2 DP 242968).	Compliant	Sydney Metro has not cleared more than the amount specified in Condition 2(e) within the study area Lot 1 DP 629326 and Lot 2 DP 242968 on the Defence Establishment Orchard Hills (DEOH). The SSTOM contractor confirmed that 59 <i>Grevillea juniperina</i> were cleared in the grubbing footprint within Lot 1 DP 629326 and Lot 2 DP 242968 on the Defence	Memo CoA 2 (2025-2026)

No.	Condition	Status	Comments	Supporting evidence
			Establishment Orchard Hills during the 2025-2026 reporting period. As of October 2026, the total <i>Grevillea juniperina</i> cleared in the grubbing footprint within Lot 1 DP 629326 and Lot 2 DP 242968 on the DEOH is calculated to be 332 individuals which is less than the 335 individuals permitted.	
	f. The number of individuals identified by pre-clearance surveys, undertaken in accordance with conditions 3-5.	Compliant	As part of the SBT pre-clearance inspections, 38 individuals of <i>Pultenaea parviflora</i> were located within the final cleared footprint aligning with the species polygons presented in the Revised BDAR and pre-clearing surveys completed under the EPBC conditions 3-5. 20 of these individuals were rooted in native vegetation and were managed in accordance with the Unexpected Finds Protocol in accordance with the EPBC Biodiversity Management Plan and the contractors Flora and Fauna Management Plan (FFMP). Offsets were retired in accordance with the EPBC Biodiversity Offset Strategy and reported to Department under EPBC Condition 17. Impacts to the 18 plants that were rooted in exotic grassland were defined as Prescribed Impacts in the Project Revised BDAR and did not generate a species polygon and therefore did not generate a species credit liability. These individuals that were not required to be offset were not reported as an unexpected find. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2023-2024 Annual Compliance Report for further details. There was no SBT, SCAW and SSTOM clearing of individuals identified by pre-clearance surveys during the 2025-26 reporting period.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2023-2024 Annual Compliance Report for further details.

No.	Condition	Status	Comments	Supporting evidence
3	To inform the preparation of the Biodiversity Management Plan required under conditions 8 and the Biodiversity Offset Strategy required under conditions 18, the approval holder must undertake pre-clearance surveys in areas not yet surveyed for the following species: a. Bynoe's Wattle. b. Downy Wattle. c. <i>Allocasuarina glareicola</i> . d. White-flowered Wax Plant. e. Small-flower Grevillea. f. <i>Micromyrtus minutiflora</i> . g. <i>Pimelea curviflora</i> var. <i>curviflora</i> . h. Spiked Rice-flower. i. <i>Pultenaea parviflora</i> .	Not triggered	This condition was addressed in the 2022-2023 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.
4	Pre-clearance surveys in areas not yet surveyed must be undertaken in accordance with the NSW Biodiversity Assessment Method, or another methodology agreed to by the Department in writing.	Not triggered	This condition was addressed in the 2022-2023 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.
5	The results of the pre-clearance surveys in areas not yet surveyed must be submitted to the Department in writing prior to, or with, the submission of: a. The Biodiversity Management Plan required under condition 8; and b. The Biodiversity Offset Strategy required under condition 18.	Not triggered	This condition was addressed in the 2022-2023 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.
6	To minimise the impacts of the action on heritage values of the Defence Establishment Orchard Hills, the approval holder must prepare an Aboriginal	Not triggered	This condition was addressed in the 2022-23 reporting period. Please refer to the Sydney Metro – Western	Please refer to the Sydney Metro – Western Sydney Airport

No.	Condition	Status	Comments	Supporting evidence
	Cultural Heritage Management Plan in consultation with the Registered Aboriginal Parties and Heritage NSW, prior to the commencement of the action. To demonstrate compliance with this condition, the approval holder must keep appropriate records to demonstrate that consultation has taken place, and how comments received during consultation have been taken into account in the Aboriginal Cultural Heritage Management Plan.		Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.	EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.
7	The approval holder must not remove or disturb any Aboriginal archaeological heritage artefacts or sites on the Defence Establishment Orchard Hills, including unexpected finds, except in accordance with an Aboriginal Cultural Heritage Management Plan prepared under condition 6.	Compliant	Removal of two Aboriginal archaeological sites on the Defence Establishment Orchard Hills (SMWSA-AS3 and SMWSA-AS4) was completed in the 2022-23 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details. No Aboriginal archaeological heritage artefacts or sites on the Defence Establishment Orchard Hills have been removed or disturbed during the 2025-26 reporting period. The Aboriginal Cultural Heritage Excavation Report was finalised in March 2024 and submitted to Heritage New South Wales as part of the Sydney Metro Western Sydney Airport CSSI 10051 conditions of approval. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2023-2024 Annual Compliance Report for further details. There were no unexpected finds reported in the 2025-26 reporting period.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 and 2023–2024 Annual Compliance Reports for further details.
8	For the protection of protected matters, the approval holder must submit to the Minister for approval a Biodiversity Management Plan that sets out requirements for Flora and Fauna Management	Compliant	The Biodiversity Management Plan (Rev 5) received formal approval on 29 March 2022. Please refer to the Sydney Metro – Western Sydney Airport EPBC	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 and 2024-2025 Annual

No.	Condition	Status	Comments	Supporting evidence
	Plans prepared under the project's Construction Environmental Management Framework.		2020/8687 2022-2023 Annual Compliance Report for further details. On 12 September 2024, a variation to the EPBC Approval (2020/8687) was made under section 143(1)(a) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Changes to CoA 35 now permit a revision of the Biodiversity Management Plan without submitting it for approval, if the taking of the action in accordance with the revised action management plans (RAMPs) would not be likely to have a new or increased impact. During the 2024-25 reporting period, Sydney Metro submitted a revised Biodiversity Management Plan (Rev 8). Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2024-2025 Annual Compliance Report for further details.	Compliance Reports for further details. EPBC 2020-8687 Variation of Conditions attached to approval, dated 12 September 2024
9	The Biodiversity Management Plan must be consistent with the Department's <i>Environmental Management Plan Guidelines</i> (2014), and must include: a. Environmental objectives, relevant protected matters, and a reference to EPBC Act approval conditions to which the Biodiversity Management Plan refers; b. A table of commitments made in the Biodiversity Management Plan to achieve the objectives, and a reference to where the commitments are detailed in the Biodiversity Management Plan; c. Reporting and review mechanisms, and documentation standards, to demonstrate compliance with the Biodiversity Management Plan;	Compliant	The Biodiversity Management Plan was developed consistent with the Department's Environmental Management Plan Guidelines (2014) and the updated version also considered the 2024 guideline update. Table 1-4 of the Biodiversity Management Plan outlines where within the plan the EPBC conditions have been addressed including condition 9. Subsequent revisions have retained these requirements.	SM-WSA EPBC Approval 2020/8687 – Off-airport Biodiversity Management Plan, Rev 8, dated 25 September 2024

No.	Condition	Status	Comments	Supporting evidence
	d. An assessment of risks to achieving Biodiversity Management Plan environmental objectives and risk management strategies that will be applied; e. Impact avoidance, mitigation and repair measures, and their timing; f. A monitoring program, which must include: i. measurable performance indicators; ii. trigger values for corrective actions; iii. the timing and frequency of monitoring to detect trigger values and changes in the performance indicators; and iv. proposed corrective actions, if trigger values are reached. g. Provide any links to other plans or conditions of approval for the action.			
10	The approval holder must not commence the action unless the Minister has approved the Biodiversity Management Plan in writing.	Not triggered	This condition was addressed in the 2022-23 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.
11	If the Minister approves the Biodiversity Management Plan then the Biodiversity Management Plan must be implemented	Compliant	During the 2024-25 reporting period, Sydney Metro submitted a revised Biodiversity Management Plan (Rev 8) to the Department. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2024-2025 Annual Compliance Report for further details. The latest version of the Biodiversity Management Plan (Rev 8) has been implemented. No non-compliances with the Biodiversity Management Plan have been identified during the 2025-26 reporting period.	- Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2024-2025 Annual Compliance Report for further details. - SSTOM nest box monitoring - SSTOM weed mapping - SSTOM weed observation data

No.	Condition	Status	Comments	Supporting evidence
12	The approval holder must submit to the Minister, for approval, a Staging Plan in relation to the construction of the action, prior to commencement of the action.	Not triggered	This condition was addressed in the 2022-23 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details. The Biodiversity Staging Plan was submitted and approved prior to commencement of the action.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.
13	The approval holder must implement the Staging Plan approved by the Minister.	Compliant	The Biodiversity Staging Plan (Rev 6) received formal approval on 30 June 2022. During the 2024-25 reporting period, Sydney Metro submitted a revised Off-Airport Biodiversity Staging Plan (Rev 7) to the Department. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2024-2025 Annual Compliance Report for further details. On 12 November 2025, Sydney Metro submitted a revised Off-Airport Biodiversity Staging Plan (Revision 8) to the Department. Refer to Condition 35 for further information. No non-compliances have been raised against the implementation of the Biodiversity Staging Plan.	- Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 and 2024-2025 Annual Compliance Reports for further details. - SM-WSA Off-Airport Biodiversity Staging Plan, (Revision 8), dated November 2025.
14	The Staging Plan must set out: a. how the construction of the action will be staged, including details of clearing and other activities to be carried out in each stage; b. mapping and delineation of the spatial location of each stage; and c. the planned timing of when construction of each stage will commence and finish.	Compliant	Section 1.3, Table 1 of the SM-WSA off-airport Biodiversity Staging Plan outlines where within the plan the EPBC conditions have been addressed.	SM-WSA Off-Airport Biodiversity Staging Plan, (Revision 8), dated November 2024.5
15	Prior to the commencement of clearing of protected matters identified in condition 2 in each stage, as	Compliant	The Sydney Metro – Western Sydney Airport EPBC Biodiversity Offset Strategy for off-airport lands	SM-WSA EPBC Biodiversity Offset Strategy for Off-Airport

No.	Condition	Status	Comments	Supporting evidence
	defined in the Staging Plan required under condition 12, the approval holder must: a. determine the offset requirement for protected matters identified in condition 2 to be cleared in that stage in accordance with the NSW Biodiversity Assessment Method and the process set out in the Biodiversity Offset Strategy required under condition 18. b. secure the required offsets for that stage.		provides a summary of offset requirements for protected matters per construction stage, Table 5-1 gives ecosystem credits and Table 5-2 gives species credits. Offset requirement were calculated in accordance with the NSW Biodiversity Assessment Method (BAM). The offsets have been secured and allocated to construction stages on a progressive basis. Letters have been provided to Department under condition 17 which append evidence of payments and retirements. The latest letter within the 2025-26 reporting period detailing all the credits purchased and retired for the Project was sent to Department on 25 May 2026, as an update to the previous letters dated 25 August 2025 and 26 November 2025, and relates to credits allocated to the project during the 2025-26 reporting period.	Lands, Rev 8, dated October 2024 - Letter SM-25-00171615, SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, dated 25 August 2025. - Letter SM-25-00259750, SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, dated 26 November 2025. - Letter SM-25-00057621, SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, dated 25 May 2026.
16	The offsets must be secured in accordance with the NSW Biodiversity Offset Scheme	Compliant	Under the Biodiversity Offset Scheme, applications for development or clearing approvals must set out how impacts on biodiversity will be avoided and minimised. The remaining residual impacts can be offset by the purchase and/or retirement of biodiversity credits or payment to the Biodiversity Conservation Fund. Evidence of purchase and/or retirement of credits or payment into the Biodiversity Conservation Fund has been provided to Department on a progressive basis. The latest letter within the 2025-26 reporting period	- Letter SM-25-00171615, SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, dated 25 August 2025. - Letter SM-25-00259750, SM-WSA (EPBC 2020/8687) Conditions of Approval 17:

No.	Condition	Status	Comments	Supporting evidence
			detailing all the credits purchased and retired for the Project was sent to Department on 25 May 2026, as an update to the previous letters dated 25 August 2025 and 26 November 2025, and relates to credits allocated to the project during the 2025-26 reporting period.	Evidence of the retirement of credits or payment to secure offsets to the Department, dated 26 November 2025. Letter SM-25-00057621, SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, dated 25 May 2026.
17	Within 3 months of retiring credits or making a payment to secure offsets, the approval holder must submit evidence of the retirement or payment the Department.	Compliant	Evidence of purchase and/or retirement of credits has been provided to Department on a progressive basis. The latest letter within the reporting period detailing all of the credits purchased and retired for the Project was sent on 25 May 2026, as an update to the previous letters dated 25 August 2025, 26 November 2025 and 25 May 2026, and relates to credits allocated during the 2025-26 reporting period. All letters have been sent within three months of making a new retirement or payment.	- Letter SM-25-00171615, SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, dated 25 August 2025. - Letter SM-25-00259750, SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, dated 26 November 2025. - Letter SM-25-00057621, SM-WSA (EPBC 2020/8687) Conditions of Approval 17: Evidence of the retirement of credits or payment to secure offsets to the Department, dated 25 May 2026.

No.	Condition	Status	Comments	Supporting evidence
18	The approval holder must submit a Biodiversity Offset Strategy for the Minister's approval, prior to clearing of protected matters identified in condition 2.	Not triggered	This condition was addressed in the 2022-23 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-23 Annual Compliance Report for further details.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.
19	The Biodiversity Offset Strategy must: a. Be prepared by a suitably qualified ecologist; b. Be prepared in accordance with the NSW Biodiversity Assessment Method; c. Be based on and consistent with the Biodiversity Development Assessment Report at Appendix A of the EIA; d. Be consistent with the principles of the Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy (October 2012); and e. Provide for the number of individuals identified in accordance with condition 3; and f. Set out: i. The process used for quantifying the impacts to protected matters based on the final design of the action, with quantification of the final number and class of biodiversity credits required to offset the residual impacts of action on protected matters; ii. Details of how the credit requirement to offset the impacts from each stage of construction (defined in the Staging Plan) will be determined and reported; and iii. How offset requirements will be satisfied, including the timeframes by which offsets must	Not triggered	The Biodiversity Offset Strategy (Rev 6) received formal approval on 29 March 2022. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.	- Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details. - SM-WSA EPBC Biodiversity Offset Strategy for Off-Airport Lands, Rev 8, dated October 2024

No.	Condition	Status	Comments	Supporting evidence
	be secured in relation to each stage of construction as defined within the Staging Plan.			
20	The approval holder must not commence the action unless the Minister has approved the Biodiversity Offset Strategy in writing.	Not triggered	This condition was addressed in the 2022-23 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details. The Biodiversity Offset Strategy was submitted and approved prior to the commencement of the action.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.
21	If the Minister approves the Biodiversity Offset Strategy then the Biodiversity Offset Strategy must be implemented.	Compliant	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details. Evidence of retirements or payment is provided in condition 17. Offsets have been purchased or retired on a progressive basis in accordance with the construction stages presented in the document. Reporting of purchase or retirement has been undertaken in accordance with condition 17, which satisfies the reporting requirements of the Biodiversity Offset Strategy. No non-compliances have been raised against the implementation of the Biodiversity Offset Strategy in the 2025-26 reporting period. Refer to condition 34 for evidence of Biodiversity Offset Strategy revisions and notifications to the Department.	- Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report. - Refer to condition 16 and 17. - Refer to condition 34 for evidence of submission of the revised Biodiversity Offset Strategy.
22	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Not triggered	This condition was addressed in the 2022-23 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.	Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details.

No.	Condition	Status	Comments	Supporting evidence
23	The approval holder must notify the Department in writing of the date of commencement of each stage of the action, as specified in the Staging Plan required under condition 12, within 10 business days after the date of commencement of the relevant stage of the action.	Not triggered	During the 2025-26 reporting period four stages of the action continued with no new stages commencing. Areas of the AEW, SBT and SCAW contracts were progressively being handed over to SSTOM. The SBT and SCAW stages concluded during the 2024-25 reporting period. All active AEW works were transferred to the FAW contract in the 2025-26 reporting period.	Not applicable
24	The approval holder must maintain accurate and complete compliance records.	Compliant	Annual Compliance Reports in respect of the EPBC Act (2020/8687) were compiled for the following reporting periods: 21 July 2024 to 20 July 2025 (this report) 21 July 2024 to 20 July 2025 (report published in October 2025) 21 July 2023 to 20 July 2024 (report published in October 2024) 21 July 2022 to 20 July 2023 (report published in October 2023) Sydney Metro document management system and record keeping. Internal compliance review that was completed in the lead-up to the preparation of the annual report.	- SM-WSA EPBC 2020/8687 Annual Compliance Report, October 2026 (this report). - SM-WSA EPBC 2020/8687 Annual Compliance Report, October 2025. - SM-WSA EPBC 2020/8687 Annual Compliance Report, October 2024. - SM-WSA EPBC 2020/8687 Annual Compliance Report, October 2023. - Sydney Metro's internal document control systems.
25	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Not triggered	The Department has not made a request under Condition 25 in the 2025-26 reporting period.	Not applicable.
26	The approval holder must: a. submit plans electronically to the Department	Compliant	On 12 September 2024, a variation to the EPBC Approval (2020/8687) was made under section 143(1)(a) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Changes to CoA 26	EPBC 2020-8687 Variation of Conditions attached to approval dated 12 September 2024

No.	Condition	Status	Comments	Supporting evidence
	b. publish each plan on the website within 3 months of the date: i. the plan is approved by the Minister, or ii. the plan is submitted to the Department if the plan is not required to be approved by the minister, or iii. this variation instrument was signed, if the plan was not required to have been published previously, or iv. a revised action management plan is submitted to the Minister or Department, unless otherwise agreed in writing by the Minister c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public d. keep plans published on the website until 24 months after the completion of the action, or as otherwise agreed by the Department in writing.		clarified what plans must be published on the Sydney Metro website. Refer to section 3 for more details on the variation of conditions. The majority of plans were completed and submitted in the 2022-23 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 Annual Compliance Report for further details. The Biodiversity Management Plan, Biodiversity Staging Plan (off-airport), and Biodiversity Offset Strategy (off-airport) were updated during the 2024-25 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2024-2025 Annual Compliance Report for further details. a. Plans have been provided to Department in electronic format (PDF). b. The latest versions of the Biodiversity Management Plan (version 8) and Biodiversity Staging Plan (version 8) have been published on the Sydney Metro website. c. Sensitive information has been redacted from the plans as required, for example redactions included details of registered Aboriginal parties and locations of Aboriginal heritage sites in the EPBC ACHMP. d. Part d of the condition is not applicable as the action has not been completed. However, the Biodiversity Management Plan, Aboriginal Cultural Heritage Management Plan, Biodiversity Offset Strategy, and Biodiversity Staging Plan remain published on the Sydney Metro Document Library.	- Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2022-2023 and 2024–2025 Annual Compliance Reports for further details. - Screenshot of plans available on the Sydney Metro website. Refer to conditions 11, 34 and 35.
27	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata	Compliant	The Biodiversity Management Plan requires the following monitoring data where related to	SM-WSA EPBC 2020/8687 Annual Compliance Report, October 2026 (this report).

No.	Condition	Status	Comments	Supporting evidence
	required under the Biodiversity Management Plan, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan.		management of Commonwealth biodiversity protected matters or Commonwealth land: • Vegetation clearing and retention • Nest box monitoring • Pre-dewatering assessment • Fauna relocation and euthanasia of pest species • Water quality and dissolved oxygen during draining of the dams • Weed mapping of certain species, weed treatment, monitoring of effectiveness of weed treatment and monitoring of weed and pathogen management during rehabilitation, if rehabilitation is required. Works within the 2025-26 reporting period have only triggered monitoring requirements for vegetation clearing, nest boxes and weed and pathogen monitoring. Dam dewatering, fauna relocation and pest species euthanasia did not occur on Commonwealth land or impact Commonwealth listed species during this reporting period by the SSTOM and FSM Contractors, noting that these activities were undertaken by Foundation Infrastructure Works (FIW) contractors (SBT and SCAW). The Biodiversity Management Plan required monitoring data undertaken within the reporting period (including associated surveys, maps, and other spatial data and metadata) and applicable to EPBC-listed species and non-listed species on Commonwealth land within the Project footprint, will be provided to the Department in the required format via email to speciesmetadata@environment.gov.au in accordance with the <i>Department's Guidelines for biological survey and mapped data</i> (2018).	• SSTOM nest box monitoring • SSTOM weed mapping • SSTOM species and weed observation data • SSTOM Pre-clearing and cleared areas mapping

No.	Condition	Status	Comments	Supporting evidence
28	The approval holder must prepare a compliance report addressing each condition of this approval for each 12-month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: a. publish each compliance report on the website within 3 months following the relevant 12-month period; b. notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication; c. keep all compliance reports publicly available on the website until 24 months after the completion of the action, or as otherwise agreed by the department in writing; d. exclude or redact sensitive ecological data from compliance reports published on the website; and e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.	Compliant	Sydney Metro–Western Sydney Airport EPBC 2020/8687 Annual Compliance Reports, have been previously prepared in October 2023, October 2024 and October 2025. This report is the fourth compliance report completed by Sydney Metro for the Sydney Metro–Western Sydney Airport project and it covers the 2025-26 reporting period. Compliance with the notification, publishing, and redaction requirements will be confirmed during the 2026-27 reporting period. Please refer to the Sydney Metro–Western Sydney Airport EPBC 2020/8687 2024-2025 Annual Compliance Report for details regarding compliance with this condition for previous reporting periods. The most recent Sydney Metro–Western Sydney Airport EPB 2020/8687 Annual Compliance Report prepared by Sydney Metro is dated October 2025, for the reporting period 21 July 2024-20 July 2025. A redacted version was published on the Sydney Metro website on 21 October 2025. The report was submitted to Department via email on 21 October 2025, along with a letter dated 20 October 2025 for submission in accordance with Condition 28 and a letter notification of publication to the website with link, dated 21 October 2025.	- Sydney Metro–Western Sydney Airport EPBC 2020/8687 Annual Compliance Report, dated October 2025 - Screenshot of Sydney Metro website showing publication of the Sydney Metro–Western Sydney Airport EPBC 2020/8687 Annual Compliance Report, dated 21 October 2025. - Submission Letter, Sydney Metro–Western Sydney Airport (SM-WSA) (EPBC 2020/8687) – Condition of Approval 28: Annual Compliance Reporting, dated 20 October 2025 - Notification Letter, Sydney Metro–Western Sydney Airport (SM-WSA) (EPBC 2020/8687) – Condition of Approval 28: Annual Compliance Reporting – notification of website publication, dated 21 October 2025 - Email from Department dated 7 July 2026 acknowledging receipt of the 2025 Annual Compliance Report
29	The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than 2	Compliant	There were no non-conformances identified for SSTOM during the 2025-26 reporting period.	Not applicable.

No.	Condition	Status	Comments	Supporting evidence
30	business days after becoming aware of the incident or non-compliance. The notification must specify: a. any condition which is or may be in breach b. a short description of the incident and/or non-compliance c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available. The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future b. the potential impacts of the incident or non-compliance c. the method and timing of any remedial action that will be undertaken by the approval holder.	Compliant	There were no non-conformances identified for, SSTOM during the 2025-26 reporting period.	Not applicable.
31	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	Not triggered	An independent audit has not been undertaken during the 2025-26 reporting period. No requests for an independent audit have been received from the Minister during the reporting period.	Not applicable.
32	For each independent audit, the approval holder must:	Not triggered	An independent audit has not been undertaken during the 2025-26 reporting period. No requests for an independent audit have been received from the Minister during the reporting period.	Not applicable.

No.	Condition	Status	Comments	Supporting evidence
	a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department b. only commence the independent audit once the independent auditor and audit criteria have been approved in writing by the Department c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.			
33	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until 24 months after the completion of the action, or as otherwise agreed by the department in writing.	Not triggered	An independent audit has not been undertaken during the 2025-26 reporting period. No requests for an independent audit have been received from the Minister during the reporting period.	Not applicable.
34	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister under conditions of this approval, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	Compliant	On 12 September 2024, a variation to the EPBC Approval (2020/8687) was made under section 143(1)(a) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Changes to CoA 34 clarified that all plans can be revised if approved by the Minister. Refer to section 3 for more details on the variation of conditions. The Minister approved a revised Biodiversity Offset Strategy (Revision 8) during the 2024-25 reporting period. Please refer to the Sydney Metro – Western Sydney Airport EPBC 2020/8687 2024-2025 Annual Compliance Report for further details. On 12 November 2025, Sydney Metro submitted a revised Off-Airport Biodiversity Staging Plan (revision 8) to the Department in accordance with Condition 35	- EPBC 2020-8687 Variation of Conditions attached to approval dated 12 September 2024 - Email to Department, Sydney Metro – Western Sydney Airport EPBC Approval 2020/8687 – Revisions to Biodiversity Offset Strategy Plan Rev 8, dated 12 November 2025 - Letter SM-25-00250275: Re: Sydney Metro – Western Sydney Airport (SM-WSA) (EPBC 2020/8687) – Notification of minor revision to action management plans, 12 November 2025.

No.	Condition	Status	Comments	Supporting evidence
			The updates were minor in nature and did not have new or increased impacts.	
35	The approval holder may choose to revise an action management plan approved by the Minister under conditions 8 or 12, or as subsequently revised in accordance with the conditions of this approval, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	Compliant	On 12 September 2024, a variation to the EPBC Approval (2020/8687) was made under section 143(1)(a) of the EPBC Act. Changes to CoA 35 now permit a revision of the Biodiversity Management Plan (CoA 8) and Biodiversity Staging Plan (CoA 12) without submitting it for approval, if the taking of the action in accordance with the revised action management plans (RAMPs) would not be likely to have a new or increased impact. Refer to section 3 for more details on the variation of conditions. On 12 November 2025, Sydney Metro submitted a revised Off-Airport Biodiversity Staging Plan (revision 8) to the Department in accordance with Condition 35. The updates were minor in nature and did not have new or increased impacts.	- EPBC 2020-8687 Variation of Conditions attached to approval dated 12 September 2024 - Email to Department, Sydney Metro – Western Sydney Airport EPBC Approval 2020/8687 – Revisions to Biodiversity Offset Strategy Plan, dated 12 November 2025 - Letter SM-25-00250275: Re: Sydney Metro – Western Sydney Airport (SM-WSA) (EPBC 2020/8687) – Notification of minor revision to action management plans, 12 November 2025 - Refer to conditions 8 and 12 for updated RAMPs
36	If the approval holder makes the choice under condition 35 to revise an action management plan without submitting it for approval, the approval holder must: a. notify the Department in writing that the approved action management plan has been revised and provide the Department with: - an electronic copy of the RAMP - an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP	Compliant	On 12 November 2025, Sydney Metro submitted a revised Biodiversity Staging Plan (revision 8) to the Department in accordance with Condition 36. The updates were minor in nature and provided for information only. The document was submitted as an electronic copy, in two versions (track changes to show the updates and a clean version). The covering letter provided a brief explanation of why Sydney Metro considers that the RAMPs are considered not likely to have a new or increased impact. Sydney Metro proposed to implement the revised plans from 2 December 2025 onwards.	- Refer to Condition 11 - Email to Department, Sydney Metro – Western Sydney Airport EPBC Approval 2020/8687 – Revisions to Biodiversity Offset Strategy Plan, dated 12 November 2025 - Letter SM-25-00250275: Re: Sydney Metro – Western Sydney Airport (SM-WSA) (EPBC 2020/8687) – Notification of minor revision to action

No.	Condition	Status	Comments	Supporting evidence
	iii. an explanation of the differences between the approved action management plan and the RAMP iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. b. subject to condition 38, implement the RAMP from the RAMP implementation date.		Implementation of the Biodiversity Management Plan is covered by condition 11. Implementation of the Biodiversity Staging Plan is covered by condition 13.	management plans, 12 November 2025
37	The approval holder may revoke their choice to implement a RAMP under condition 35 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 35, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 35.	Not triggered	Sydney Metro did not revoke their choice to implement any of the RAMPs requested.	Not applicable
38	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then: a. condition 35 does not apply, or ceases to apply, in relation to the RAMP b. the approval holder must implement the action management plan specified by the Minister in the notice.	Not triggered	The Minister has not given this notice during the reporting period.	Not applicable

No.	Condition	Status	Comments	Supporting evidence
39	At the time of giving the notice under condition 38, the Minister may also notify that for a specified period, condition 35 does not apply for one or more specified action management plans.	Not triggered	This direction was not received by the Minister during the reporting period.	Not applicable.
40	Within 20 business days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Not triggered	The approved action is not yet complete.	Not applicable

3. Summary of Compliance

This section summarises the findings of the annual compliance report for this reporting period.

3.1 Summary of compliance report findings

There are 40 conditions of approval; during the reporting period 21 conditions were considered to be compliant, 19 conditions were considered not applicable, and no non-compliances were identified. The majority of the “not applicable” conditions were due to requirements either not being triggered or because the requirements of the condition fell outside the scope of the current reporting period or have been addressed in previous reports.

3.2 Variation to the EPBC Approval (2020/8687)

On 12 September 2024, a variation to the EPBC Approval (2020/8687) was made under section 143(1)(a) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The variation was to delete conditions 26, 34 and 35 and substitute with new conditions to do the following:

- Change to condition 26 clarified what plans must be published on the projects website.
- Change to condition 34 clarified that all plans can be revised if approved by the Minister.
- Change to condition 35 permitted revision of the Biodiversity Management Plan and the Biodiversity Staging Plan without submitting it for approval, if the taking of the action in accordance with the revised action management plans would not be likely to have a new or increased impact.

Sydney Metro has implemented to the variation to the conditions since the approval was varied on the 12 September 2024.

4. New environmental risks

No new environmental risks have been identified during the reporting period.

As the project advances, Sydney Metro and its contractors will continue to monitor and manage environmental risks through the Sydney Metro and our contractor’s ISO 14001-compliant environmental management systems.

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